



"Rosenthal, Amy"
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02/05/2012 11:59 AM

To ArcticAR <arcticar@urscorp.com>
cc
bcc
Subject FW: Reminder: Review of NMFS Arctic EIS Chapters 1-2

-----Original Message-----

From: Candace Nachman [mailto:Candace.Nachman@noaa.gov]
Sent: Wednesday, April 27, 2011 2:47 PM
To: Curtis.Jennifer@epa.gov
Cc: Amy_Rosenthal@URSCorp.com; Soderlund.Dianne@epamail.epa.gov;
Shaw.Hanh@epa.gov; Reichgott.Christine@epamail.epa.gov; Jolie.Harrison
Subject: Re: Reminder: Review of NMFS Arctic EIS Chapters 1-2

Jennifer, Hanh, and Dianne,

Thank you so much for your comments and for getting them in early. I really appreciate it.

I have just taken a quick look at your comments. I appreciate you taking the time to explain some of the issues and ask important questions. This will help us as we move forward. I think once all of us have had a chance to digest your comments and see what the other groups had to say about the description and discussion of this issue, we will likely need to all get on the phone and talk again. As Jolie and I mentioned before, our understanding of the discharge issue is cursory at best. So, we therefore appreciate the time that you are taking to help us with these issues in the document.

Candace

Curtis.Jennifer@epa.gov wrote:

>Hello Candace,
>
>Attached are EPA's comments on the preliminary draft Chapters 1 and 2
>for the NMFS Arctic Seismic and Exploration EIS. Per your request, we
>attempted to offer specific language where we could, but unfortunately
>could only state certain recommendations or ask clarifying questions in
>comment form. We focused our review and comments primarily on the
>relevant sections/discussions on the "zero discharge" issue in Chapter
>2, and EPA's regulatory role(s). Overall, we do have concerns because:
>
>1. The descriptions of the Arctic GP requirements are not accurate;
>2. The five waste streams Shell proposes to collect and
>transport/dispose in the lower 48 are just that, a proposal that hasn't
>happened yet, and applies only to Shell's lease blocks in Camden Bay of
>the Beaufort Sea;
>3. The Shell proposal is independent of, and a separate agreement from,
>the regulatory process;
>4. One company's proposal to collect and barge five waste streams does
>not mean it is feasible for other companies or in other areas; and
>5. There is a tremendous potential for inconsistent or conflicting
>requirements among federal agencies.
>
>Since EPA's estimated reissuance dates for the Beaufort and Chukchi GPs

>are aligned with NMFS's EIS schedule, we will need to continue to
>coordinate very closely moving forward. We believe that additional
>discussion may be needed to further clarify some of these issues.
>
>Thank you for the opportunity to comment and offer our recommendations
>at this time. Please let us know of any questions you may have.
>
>
>(See attached file: Arctic EIS Chapter 1 (01272011) to EPA & ANOs-EPA
>comments.docx)(See attached file: Chapter 2 Arctic EIS (0407) for agency
>review-EPA comments.docx)
>
>
>_____
>Jennifer Curtis, NEPA Reviewer/Compliance Coordinator
>US EPA-Alaska Operations Office
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>Anchorage, AK 99513
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>
>
>
>From: Candace Nachman <Candace.Nachman@noaa.gov>
>To: Hanh Shaw/R10/USEPA/US@EPA, Jennifer
>Curtis/R10/USEPA/US@EPA, Dianne Soderlund/R10/USEPA/US@EPA
>Cc: Amy_Rosenthal@URSCorp.com
>Date: 04/21/2011 08:29 AM
>Subject: Reminder: Review of NMFS Arctic EIS Chapters 1-2
>
>
>
>Hi,
>
>This is just a friendly reminder to please submit your comments on the
>first two chapters of the Arctic EIS to me by next Friday. There are
>some additional details in my original email below.
>
>Please feel free to contact me with any questions or concerns.
>
>Thanks,
>Candace
>
>Candace Nachman wrote:
>Dear Hanh, Jennifer, and Dianne,
>
>Thank you again for our conference call the other week. I think
>it was very useful and helpful in guiding us in our understanding
>of discharges in the Arctic. You will see that we have tried to
>capture the points of our discussion in Chapter 2. We have
>decided that it is too difficult to have an alternative carried
>through for full analysis that deals with discharges. Instead, we
>have described it in the Alternatives Considered But Dismissed
>From Further Consideration section and then worked it into the
>additional mitigation measures piece of the alternatives that are
>carried forward for full analysis. We would like to focus on
>those discharges that have been linked to potential impacts on
>marine mammals and their habitat. It would be very helpful to us
>if you provided feedback on the pieces specific to discharge
>(along with your review of the rest of the documents).

>
> I have attached both Chapters 1 and 2 to this email for your
> review and comment. It would be most helpful to have your
> comments in track changes. Also, actual suggested track changed
> language or text is more helpful than comment bubbles, but please
> use the comment bubbles for explanation as needed. Also, I would
> appreciate one set of comments from the EPA.

>
> Please submit your comments to me by Friday, April 29. I will
> then compile them and send to URS.

>
> Feel free to contact me with any specific questions or concerns.

>
> Thanks,
> Candace

> --
> Candace Nachman
> Fishery Biologist

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